

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

UNITED STATES OF AMERICA)

2005 MAR 21 P 3:19

V.)

Criminal No. 04-10298-DPW
U.S. DISTRICT COURT
DISTRICT OF MASS.

MARKO BOSKIC)

GOVERNMENT'S REQUEST FOR LEAVE TO FILE OPPOSITION TO DEFENDANT'S
MOTION TO SUPPRESS STATEMENTS AND OPPOSITION TO DEFENDANT'S
MOTION FOR DISCOVERY RELATED TO HIS MOTION TO SUPPRESS
IN EXCESS OF TWENTY PAGES

Pursuant to Local Rule 7.1(B)(4), the government requests leave of the Court to file an opposition to Defendant's Motion to Suppress Statements and Motion for Discovery Related to his Motion to Suppress, in excess of twenty (20) pages. In support of the request, the government states:

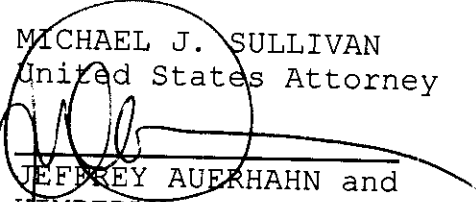
First, because the two motions filed by the Defendant are related and it is more efficient to handle them together, the government is responding to both motions in the same memorandum. Some of the same caselaw and legal principles resolve both motions. Thus, the government's thirty-nine (39) page memorandum is an opposition to two motions.

Second, the Defendant claims a violation of his Fourth, Fifth and Sixth Amendment rights. It is impossible to discuss each of the Defendant's arguments (as well as the other issues that need to be addressed in the response), nor respond adequately to, and rebut, the claims he raises, in twenty pages or less.

Wherefore, pursuant to Local Rule 7.1(B)(4), the government requests leave of the Court to file an opposition to Defendant's Motion to Suppress Statements and Motion for Discovery Related to his Motion to Suppress, in excess of twenty (20) pages.

MICHAEL J. SULLIVAN
United States Attorney

By:


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DATE: March 21, 2005